

Exhibit E

From: Keith Altman <kaltman@excololaw.com>
Sent: Thursday, October 31, 2019 12:56 PM
To: Lazar, Zachary R.
Cc: Herrington, Beth; Benjamin Jeffers
Subject: RE: JPay Arbitrations

[EXTERNAL EMAIL]

All,

- 1) These individuals are part of the putative class. Until that issue is resolved they remain members of the class.
- 2) The terms that apply here are those which were in effect at the time the case was filed.
- 3) Seems to me that Jpay acted inappropriately in changing the terms *after* the case was filed. Those changes do not apply to anyone who is in the putative class.

Since Jpay does not agree with the terms of the arbitration agreement it forced upon the MDOC prisoners and their families, we will be filing a motion to compel arbitration in the Kensu matter on behalf of all putative class members.

For years, Jpay insisted upon arbitration on outrageous terms in a deliberate attempt to dissuade anyone from taking them on. Now that someone has, Jpay is running the other way.

I will assume that based on our conversations and Jpay's letter that we have met and conferred on the topic.

See you in Bay City.

Keith

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From: Lazar, Zachary R. [mailto:zachary.lazar@morganlewis.com]
Sent: Thursday, October 31, 2019 1:34 PM
To: Keith Altman <kaltman@excololaw.com>
Cc: Herrington, Beth <beth.herrington@morganlewis.com>; Benjamin Jeffers <bjeffers@hhbjlaw.com>
Subject: JPay Arbitrations

Counsel:

Please see the attached correspondence.

Thank you,
Zachary

Zachary R. Lazar
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